

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Susan Sieger-Grimm, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com ssieger-grimm@brownrudnick.com <i>Proposed Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kionoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKionoian@genovaburns.com <i>Proposed Local Counsel for the Official Committee of Unsecured Creditors</i>	BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (617)536-1766 Fax: (617)289-0466 Email: spalley@brownrudnick.com
In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) Jointly Administered

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE AND RESERVATION OF RIGHTS REGARDING DEBTORS' INSURANCE MOTION

The Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the chapter 11 bankruptcy cases of BlockFi Inc. and its affiliated debtors and debtors in possession (collectively, the “**Debtors**” or “**BlockFi**”) files this response and reservation of rights (the “**Response**”) to the *Debtor’s Motion For Entry of Interim and Final Orders Pursuant to 11 U.S.C. Sections 105(A) and 363(C) Authorizing the Debtors to (I) Continue, Renew, or Supplement Insurance Policies, (II) Pay Insurance Premiums and Related Obligations Thereon, (III) Continue, Renew, or Supplement the Surety Bond Program, and (IV) Granting Related Relief* [Docket No. 11] (the “**Motion**”).² In support hereof, the Committee respectfully states as follows:

1. The Committee does not object to the Motion.
2. The Committee’s current lack of objection to the Motion shall not be construed as a waiver of any right to bring any claim available under the Bankruptcy Code and relevant state laws, including without limitation the right to avoid any transfer, to seek discovery in respect thereof, or to seek standing to pursue any claim on behalf of the Debtors’ estates. All such rights are expressly preserved.

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² Capitalized terms not otherwise defined herein shall have the meanings provided in the Motion.

Dated: January 10, 2023

Respectfully submitted,

GENOVA BURNS LLC

By: /s/Donald W. Clarke

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